

Written statement of Otho Allen Ezell, Jr.

Mr. Chairman and Members of the Committee:

It is my pleasure to be here today. Let me commend you for recognizing Degree Mills as a problem and for holding these hearings. Although I was not present during the January and March, 1924 Congressional Degree Mill hearings, I was present for Congressman Claude Pepper's hearings in December, 1985, and Senator Susan Collins' hearings in May, 2004. Although there was a lot of talk during these hearings, there were no lasting actions taken. Now here we are again. In fact, the entire matter has just blossomed with the advent of the internet.

For background, staff members for Congressman Pepper were able to purchase a Ph.D. for the Congressman from Union University, Los Angeles, Ca., and staff for Senator Collins were able to purchase both Bachelor and Masters degrees in Biology and Medical Technology respectively for her from Lexington University, based in Middleton, New York (via www.Degrees-R-Us.com). I find it odd these entities were never "raided" by federal or state law enforcement in execution of a federal search warrants, and their operator's were never prosecuted. I have previously arrested Degree Mill operators with less probable cause. As high profile as these schools were, and nothing happened, I find this unbelievable.

I agree with Senator Collins that what her committee uncovered is just the "*tip of the iceberg*". They found 1,200 resumes as contained in a government-sponsored data base, listed degrees from 14 different Degree Mills. After a degree audit of six federal

agencies, including the Pentagon, for GS-15 and above positions, they determined at least 463 federal employees (at these agencies) had obtained degrees from unaccredited schools. The United States Government paid \$150,387.80 to several of these schools for those federal employees who requested reimbursement. Keep in mind these schools do not have a dollar charge per credit hour (only X dollars per degree), thus they created a fictitious billing statements for a per course/hour charge, which was then sent to their agency for payment.

Thus, if only two percent (2%) of federal agencies were audited at which they found 463 employees at a cost of \$150,387.80 to the government, I wonder what the results would be if a degree audit would be conducted at the remaining 98% of federal agencies. Further, Senator Collins committee found the five Degree Mills they encountered with the above employees had, from 1995-2003, grossed \$111,000,000. I also wonder what the entire universe of Degree Mills looks like. Senator Collins committee estimates Degree Mills gross at least \$500,000,000 each year (and this may even be understated).

I am a second generation FBI Agent having retired in December, 1991. For an eleven year period I investigated Degree Mills throughout the United States and abroad. Collectively, these many investigations were called Operation Diploma Scam (DIPSCAM). During this time, I responded to advertisements as a potential buyer, received the school's literature via the United States Mails, made and recorded interstate telephone calls to and from my schools, all resulting in my purchasing various degrees which were accompanied by transcripts.

In all those years, the most new work I did were several papers (not more than 5 pages in length) for Masters Degrees. In some instances, I negotiated with the school representative relative on my Grade Point Average (GPA). All of my schools offered degree verification for employment purposes and some even had alumni association, class rings, school decals, sweat shirts, hats, decals, etc., all indicia of legitimacy. However, most did not have a campus nor an educational facility, faculty, any meaningful academic instruction, nor educational motivation, etc. Since their advertisements/brochures/literature looked good, thus they must be "real". [Put 1,000 or 2,000 miles between a students mail box and his school, anything is possible. The student never knows the school only exists at a mail drop/answering service in a distant city].

During our first investigation, after we had purchased our Bachelor, Master, and Ph. D. degrees from Southeastern University, Greenville, S.C., all based on life experience (with no new work submitted), officials of then North Carolina National Bank (now Nations Bank), Charlotte, North Carolina, (in cooperation with the FBI), corresponded with officials of Southeastern University and indicated two young men had applied for positions with the bank, thus they sought verification of their degrees. The President of the Southeastern University then verified to bank officers, our degrees (and transcripts) via the U. S. Mails, and made glowing remarks about his two graduates. When we took a tour of our alma mater, we were recruited to raise funds for the university and keep one third for ourselves. During our tour, the President of the university showed us where our student files were kept along with the files of their many other graduates.

Later, the Assistant United States Attorney, Western District of North Carolina, wanted to be able to prove in U.S. District Court that Southeastern Seminary was as crooked as

the university, thus a third FBI Agent negotiated for a Masters degree in Divinity and agreed on a price of \$5,000. On 5/4/81, at the appointed time for the Agent to pay for, and pick up his degree, we three arrived as FBI Agents with a federal search warrant. We took all documents and other items described in the search warrant, including a cabinet full of student files. We then left for Charlotte, which is about 90 miles North of Greenville, S.C. The seized items were then entered into evidence and the appropriate paperwork completed – none of the records had yet been reviewed.

The next morning we received a telephone call from local authorities in Greenville, South Carolina, who advised that Dr. Alfred Q. Jarrett, President and founder, Southeastern University, had committed suicide during the evening, after we left his university which had been operated from several rooms in his personal residence.

When we reviewed the records of Southeastern University, we determined during its eleven year existence, they had 620 "graduates" of which 171 were employed by federal, state, and local governments employees. Some "graduates" held Senior Executive Service (SES) positions in Washington, D.C.

As result of the above, we created a computerized data base of all our "graduates", then and on an on going basis, we furnished these names to the Office of Personnel Management, Inspectors General of the respective agencies, and to the various State Attorneys General. As each DIPSCAM case was adjudicated, we entered a list of the schools "graduates" into evidence, thus making it a "public record" which then became

available to universities and the media. At the time of my retirement in December, 1991, the DIPSCAM data base contained the names and all pertinent information on over 12,000 "graduates". Some worked in private industry, education, law enforcement, medicine, military, and numerous state and federal agencies.

During DIPSCAM, from 1980-1991, we purchased 40 degrees, executed 16 federal search warrants, had 19 indictments returned by the Federal Grand Jury, convicted 21 persons, and over 40 schools were dismantled. We never lost a case and won the only two convictions which were appealed. Only one case (with multiple convictions) went to the U.S. Supreme Court, which the court declined to hear thus sustaining the opinion of the Fourth Circuit Court of Appeals affirming the conviction. During DIPSCAM, the highest gross revenues we found were \$2,000,000 for our Degree Mills. [Details for many of the schools we visited are contained in the attached listing and articles].

Degree Mills are not just recent problems. We have had them in the United States since about 1835. As long as we have a credential conscious society, where the degree/transcript you possess gets you the interview/promotion/salary increase (instead of the requisite knowledge/job skills), then we will always have Degree Mills. I say this because Degree Mills are nothing but criminal enterprises operated for profit. This is Education Fraud and no different from any other fraud (and in some instances similar to counterfeiting), only here the crooks are selling either fictional or worthless academic credentials (and again, sometimes counterfeit documents).

These crooks are like chameleons, they will change their criminal enterprise to adapt to their surroundings and conditions, thus their scheme will always "blend in". This is what

has happened in the last decade with the acceptance of the concept of credit for life experience, non-traditional education, distance learning, etc. The Degree Mill operators due their best to blend in with legitimate colleges and universities offering real distance learning. In fact, many have copied materials for their web sites from legitimate colleges and universities, and in some instances, even named their entity one letter or word different from the real school, intentionally wanting its victims to confuse it with the real school which has name recognition and reputation. These Degree Mill operators know how to expertly adapt to current conditions and how to exploit gaps in federal and state law, law enforcement priorities, prosecutive guidelines, etc.

I know of one instance where an individual who operates numerous Degree Mills, after the horror of 9/11 and resulting creation of the Department of Homeland Security, he then created the International College of Homeland Security where he offers certificates/diplomas in homeland security, in addition to Bachelor, Master, and Ph.D. degrees in public administration/homeland security and public safety, along with certificates and diplomas in human reliability/beyond crisis prevention. He even has a "Homeland Security Specialist Program" where he discusses our vulnerability to terrorism in his sales pitch. If this is not enough, this college states "all of our course designers, developers, and professors are experts in their particular field of homeland security and the public safety. Most are former or present FBI Agents, criminal investigators, emergency and disaster planning professionals, lawyers, U. S. Border Patrol personnel, U. S. Customs professionals and homeland security personnel." [I highly doubt this].

They also operate Homeland Security University whose motto is "Protecting Your Country Through Knowledge" (www.homeland-security-college.org). This university also has an on line "University Store" where various items are for sale bearing the school logo.

Today, this college indicates it is located in Moscow, Russia; yesterday, it was in Washington, D.C.; Rochester, New York ; Mariastein, Switzerland; Liberia and Canada, even though it is operated by Richard J. Hoyer, Rochester, New York, with assistance from Dixie Randock, Spokane, Washington, and can be contracted through www.4acollegedegree.com. They also operate St. Regis University of Monrovia, Liberia and various related entities. St. Regis University, (and its related entities), is probably one of the largest Degree Mills operating today. These universities are highly mobile, and their purported addresses change frequently.

Degrees from St. Regis University have appeared all over the United States. Recently, eleven school teachers in Georgia were found to have graduate degrees from St. Regis University and these teachers had been paid increased salaries for several years because of these graduate level degrees. Once the \$36,000 has since been repaid by the teachers, whose teaching credentials were later revoked, they all resigned. State officials are considering if they will also prosecute these teachers. If just one state has 11 "graduates" of St. Regis University for which they were paid increased salaries for these graduate, I wonder how many other graduates are employed in the remaining 49 states, and how many tax dollars are being paid.. Under the No Child Will Be Left Behind Act, most

teachers have until 2005-2006 to meet federal standards for being "highly qualified," which can include holding an advanced degree in the subject they teach. This increased pressure on the teachers, in conjunction with teachers busy schedules, may be turning them to Degree Mills.

In San Antonio, Texas, many firemen were recently found to have degrees from St. Regis University, thus they received increased salaries. This too made its way into the press. Again, I wonder where else, and in other professions, where this is happening.

The Chrysler Foundry in Indianapolis, Indiana, will be closing in 2007, thus many of these displaced employees feel the need to obtain a college degree before they reenter the job market. Chrysler offers its employees up to \$4,600 each year in tuition assistance, with the requirement that the courses are from an accredited institution. Chrysler, with the help of the local UAW, promoted and paid for the St. Regis program. More than 76 employees enrolled in St. Regis University. That's at least \$42,000. Now that this scam has been exposed by WTHR TV in Indianapolis, many Chrysler workers are embarrassed and outraged. A Bachelor's Degree at St. Regis University is just \$895. (A listing of all Hoyer/Randock's schools is attached). Fictitious or worthless accreditation is another integral building block of these Degree Mills.

These and other Degree Mills do not operate in a vacuum. These are professional operations, which take planning, preparation, and organization in order to run smoothly.

- A. A 3rd party academic consultant or referral entity
- B. An independent accreditation entity to accredit the Degree Mill
- C. The Degree Mill itself – can be a store front, mail drop, or rented office (or just “virtual”)
- D. A transcript/records storage/verification service – provides certified transcripts to graduates and verification of degrees to employers
- E. A 3rd party academic credential evaluation service ... degrees from _____ are equivalent to _____. [Many employers have been fooled by this].

Thus, the public/business/government must not only beware of the Degree Mills which change their names almost daily, then we have the Accreditation Mills, Academic Consultants/Referral Entities, Transcript Verification/Records Storage entities, and Credential Evaluation Services – which support the Mills and are all tied in to the Degree Mills. When an organizational chart is prepared for a large Degree Mill, it probably resembles an octopus with its numerous tentacles.

Years ago, if a criminal had prayed for a way to reach the public without spending a fortune on postage; prayed for a means to get their catalogues into peoples hands without incurring great printing costs; prayed for an alternative to buying expensive advertising in newspapers and magazines; and prayed for a way to run a business anonymously along with banking off-shore, electronically and privately, his prayers would be answered shortly.

Along came *THE INTERNET*. At no other time in the past 25 years have I observed such a boon to this type of white collar crime. The internet knows no borders-our crooks are selling their worthless degrees to persons in other countries; conversely, their crooks are selling their worthless degrees to our citizens. Several times, our crooks have

established their base of operation for their Degree Mills in foreign countries as a means of thwarting U. S. law enforcement agencies and regulators. The reverse is also true – last year I observed a Degree Mill whose web site showed the skylines of Jacksonville and Tampa, Florida, and they had a local Florida address (a mail drop). When I checked to determine where its operators were located, it was Hong Kong, China.

If the above (in conjunction with desk top publishing, cut and paste, etc.) is not enough to make you question all academic documents, then we have “lost replacement degree services” or “novelty documents” or “fake diplomas and transcripts” in the names of legitimate, accredited, traditional colleges and universities which are available via many web sites today for less than \$100. Anything and everything is available for sale on the internet today. Some of these sites are:

www.diplomamasters.com, www.diplomaservices.com, www.diplomasforless.com, and www.diplomaville.com (copies of these web sites are attached to this statement).

For the past ten years, detection and prosecution of Degree Mills has been on a catch-as-catch-can basis. There has been no concerted effort by any federal or state law enforcement agency to ferret out Degree Mills, prosecute their operators, and prosecute those persons who knowingly purchase and use these fictitious credentials. Yes, there were isolated instances where Degree Mills were investigated by the FBI and USPO and prosecuted [La Salle University in Louisiana-operated by James Kirk, and Columbia State University in Louisiana/California as operated by Ronald Pellar], only after numerous complaints had been filed by victims. Both LaSalle University and Columbia

State University , due to their advertisements in national publication, they were highly visible to all, (including law enforcement) especially with some of their advertised claim (a degree in 27 days, etc.). Ironically, Kirk (a "graduate" of one of my alma maters, Southeastern University) later operated two schools from his cell at a federal prison camp, whereas Pellar operated Columbia State University while he was a federal fugitive resulting from another court action. Kirk/LaSalle University grossed \$36.5 million and Pellar/Columbia State University grossed somewhere between \$20-72 million. But this is still pocket change when considered in the shadow of the "University Degree Program".

By far, the largest and most sophisticated Degree Mill operation ever conducted, "University Degree Program" probably grossed about \$ 435 million from 1998 through early 2003, when the Federal Trade Commission filed restraining orders in order to stop another smaller fraud (International Driving Permits) which were being sold by the same criminals , from the same boiler rooms, via the same computer addresses. This operation, run by Yacov Abraham, and relatives, of Boston, New York City, and Los Angeles, through two "boiler rooms" (telephone call centers) in Jerusalem and Bucharest, employed 45 people per shift (two shifts daily) in order to primarily call residents of the United States and Canada. This is the operation which caused millions of spam mails to be sent daily all over our country. The FTC had over 90,000 different spams from this operation. Generally, initial cost for the degree was \$2,400, less the \$500 "instant scholarship", and then the bargaining began. The "graduation kit" included the diploma

Professors you have never met nor spoken to. You could pay by check, credit card, wire transfer to their "accountant" in London or Cypress. They even accepted American Express, Master Card, Visa, etc. [Imagine, getting frequent flyer miles at the same time as your degree]. University Degree Program schools utilized accommodation addresses in Scotland, United Kingdom (London), The Netherlands, Switzerland, etc., with degrees drop shipped abroad and re-mailed in the Los Angeles area. This was a very sophisticated operation, with all calls being logged into a computer so the salesman could locate you by name/telephone number, knowing exactly where they were in the pitch when you were last contacted.

During this six year period, UDP sold degrees/transcripts on eighteen schools, then its employees began their own spin offs, which probably total about fifteen more and continue to this day. Many UDP employees probably thought, now that they had been trained on the operation, and it was so profitable (very little overhead since there is no campus, buildings, faculty, retirement accounts, etc.), and I can steal the boiler room scripts, why not start my own school-which they did. (Details regarding all UDP schools and spin offs, is attached. Also attached is a listing of the degrees sold by UDP schools in the medical field). Where do you think these "graduates" who purchased degrees in medical fields are employed? Imagine a business which has two telephone marketing rooms, 45 employees each, two shifts per day – all selling degrees, transcripts, with verifications.

Ironically, since I still respond to spasms, as I write this document, at 11:51AM on 9/21/04, I received a call from one Charles Baker, in New York State, telephone (917)

254-4102, who introduced himself as a Registrar representing Somerset University whose web site is located at www.somersetuniversity.org. He stated they are an "international correspondence diploma program" which has been around since the 1980's. In less than one minute, he found me qualified for my MBA degree (comes with a student identification number, certified transcripts, professor letters of recommendation, verification of degree details, and we agreed on a modest GPA of between 3.5 – 3.8 (magna cum laude). The date of the degree is of my choice. The entire package will be sent to me within 10-15 days via Federal Express – all for the modest cost of \$1,995. He pointed out I can not use this degree for transfer purposes (although many have tried), but this is designed for "professional purposes, to get pay raises, and promotions". He is sending me an e mail to confirm what I will get for my money and will call back in 30 minutes to see which credit card I want to use. [This sounds like a UDP clone to me].

There are 2,567 unrecognized schools (many of which are Degree Mills) and 202 unrecognized accreditors (some are operated by the same persons as the Degree Mills). Thus, it is easy for the operators of Degree mills to "blend in".

Staff has asked what I have done to ensure Degree Mills do not proliferate.

As an FBI Agent, for an eleven year period, I identified as many Degree Mills as possible, thereafter "making cases" on these entities and their operators, resulting in their indictment, arrest, and conviction. The side benefit was the closure of the Degree Mill. I

Charlotte FBI office took some heat from FBI Headquarters for all its work on Degree Mills. After my retirement and the ending of DIPSCAM, the FBI made no organized effort in this arena. As if this was not bad enough, The Internet was now world wide and the Degree Mill operators quickly realized its potential and its world wide market.

After retiring from the FBI, I have continued to stay abreast of Degree Mill comings and goings by responding to advertisements and spams, like I mentioned above. It is only in this way one will know "what is being sold, by whom, and for how much." I have written several articles on the subject, and have made presentations to both government agencies educational groups, and to law enforcement. I have consulted with prosecuting and defense attorneys, and have consulted with federal prosecutors in the area, and attended Senator Collins two day hearings in May, 2004.

Dr. John Bear and I have written a reference book on this subject, titled "Degree Mills" which is being published by Prometheus Books. This book will be available in January, 2005. We have also established a web site, www.DegreeMills.com which will be operational shortly as a means to keeping people up to date on what's happening in the world of Degree Mills. Additionally, we are part of a network of like minded professions in this area. Further, Dr. Bear and I have associated ourselves with the Commercial Services Division of U. S. Investigations Service in order to maintain and update their

In my opinion, Degree Mills are a problem because they:

Damage by misunderstanding – similar to counterfeit currency, if I can no longer trust the currency I am given, then its value diminishes. If I can't trust the educational credentials I am presented, then they are worthless.

Devalue earned degrees (look-a-likes and sound-a-likes). I have previously purchased counterfeit diplomas from both of my daughter's almmaters (University of North Carolina and University of Florida). These were exact replicas, except the signatures were incorrect for my graduation date. Agreed, I did not have transcripts, but those were available to me elsewhere. I realize you will never be able to take away the education my daughter's received, however, when counterfeit degrees of our legitimate, regionally accredited, traditional universities are available for sale via the internet, this can do nothing but take some of the glitter off the real earned degree.

I have also seen instances where the criminal deliberately established his internet based school in the exact name as a legitimate university two thousand miles away. I recall the Western Washington State University which was being operated from Norcross, Georgia, and designed for students to believe this was the legitimate Western Washington State University in Wellingham, Washington..

Confuse the public – I recall the United States University of America, ostensibly located at an address on Wisconsin Avenue in Washington, D.C. In reality, the addresses it used was the physical address of the United States Post Office

building on Wisconsin Avenue, where its post office box was located. They also used the address of the Sincerely Yours Answering Service. Needless to say, the school colors were red, white, and blue. This school targeted foreign students who mistakenly presumed this university to be government approved/sponsored based on its name and address in Washington, D.C. [In reality, its operator was located in Palatka, Florida, before he later fled the United States to avoid arrest].

Defraud "students" – Many Degree Mills have excellent web sites, quality multi color publications, use all the right buzz words, portray a distinguished faculty, pictures of grand buildings (some are in reality national historic sites, public buildings, etc.), and some even offer a "virtual tour". All this, in addition to its "accreditation". Many even pirate their text from the web sites of legitimate colleges and universities. These are criminal operations, run by slick folks and are designed to deceive its potential students. Depending on the sophistication of the Degree Mill, it can be easy to fall victim, without truly knowing it is in fact a Degree Mill.

Deceive employers, customers, clients, patients - Remember, the Degree Mill is established to sell you the diploma with the backup verification of the degree awarded. The heart of its hustle is the verification it provides you later for the new job, promotion, etc. Not only will they provide you verification, they will provide you with letters of recommendation from several professors. [You would have had a hard time meeting these Professors in view they did not exist.]. Sometimes, we find the same professors at numerous schools.

Lower prestige abroad – see all the above

Staff has also asked what safeguards and strategies can be developed to ensure that consumers, state governments, and the federal government are protected against fraudulent degrees and institutions.

Encourage the Department of Education (which held its “Diploma Mill Summit” on 1/15/04) to develop and publish on the internet, a web based listing of legitimate (accredited) colleges and universities in the United States. Once published, publicize the fact this list exists. In this manner, a potential student will not have to dig for the information, but can immediately locate this list.

Encourage all states to develop educational statutes similar to or identical to the State of Oregon and the resulting State of Oregon, Office of Degree Authorization (www.osac.state.or.us/oda). The ODA maintains a web site on which all aspects of the Oregon education statutes are detailed, along with a list of illegal degrees in Oregon for which persons using same as academic credentials in Oregon can be arrested. Also listed are unaccredited colleges whose degrees are approved by ODA for use in Oregon (mainly Bible schools). (A copy of the Oregon statutes and the ODA web site along with its illegal schools list is attached).

We do not need any new federal statutes. The Fraud By Wire, Mail Fraud, Computer

Request the FBI or U. S. Postal Service to assign one investigator to work on Educational Fraud exclusively. Let them respond to some advertisements, purchase some degrees and transcripts, do some undercover work, execute several search warrants, seize assets, obtain indictments and make some arrests. I guarantee you the word will get out immediately in this small tightly knit community of Degree Mill operators. Normally, they all keep up with their competition.

Remember the basics of Supply and Demand. If we decrease the value of the bought degree and transcript, then correspondingly, we will dry up the production (supply) side. If both state and federal authorities prosecute the most egregious users of the Degree Mill paper, and at the same time arrest and close down the Degree Mill operators, we will thus achieve our desired objective. If no one wants the paper, then no one will want to produce the paper, since it won't sell.

The Federal Government needs to be consistent in all its handling of federal employees using Degree Mill degrees. I was appalled that the official at the Department of Homeland Security was hung out to dry after a 19+ year career for her possession of degrees from Hamilton University, especially when you consider the position she held had no education qualification. She is not "street wise", had heard of Degree Mills but not accreditation mills, and did not know it was a degree mill. She obtained these degrees over a several year period with her own funds-no federal money involved. In my opinion, her agency (the then new Department of Homeland

Security) was gun shy after all the publicity this received in the Washington, D.C. press, then took the easy way out by rescinding her security clearance, and showing her the door, resulting in her later resignation. Possession of a Degree Mill diploma is not itself grounds for revocation of a security clearance. When I was employed by the FBI, no one came to me to rescind my clearance because I was purchasing various degrees. Thus, she became the "poster child" for government employees with Degree Mill paper, even though many, many, more federal employee have been exposed with the same type degrees (and some even used federal funds and their jobs had an education requirement), and they are still employed. I see no consistency in this application.

What has happened to: Charlie Abell, Deputy Under Secretary of Defense – Procurement and Readiness (Columbus University); Jimmy Shirl Parker, Chief Information Officer, Federal Technology Service, General Services Administration (California Coast University; Daniel P. Matthews, Chief Information Officer, Transportation Department (Kent College) and many, many others.

As in the private sector, you lead by example, you must have one set of rules, consistently and evenly applied to everyone. From my point of view as an outsider, I do not see this happening in Washington, D.C. I do wonder why these

this is unjust and our government can do better. This is not the example we want to set for the rest of the nation.

The U. S. Senate (and GAO investigators) should finish what they started. The other 98% of the federal government should have degree audits also conducted by the GAO to determine the use of Degree Mill paper by federal employees and exactly how much the federal government has paid for these degrees. We all know they have not yet even scratched the surface.

I attended both days of the Degree Mill hearings chaired by Senator Collins and Congressman Tom Davis. I applaud them for these hearings, the first since 1984. What was missing both days, was anyone from federal law enforcement. Not only were they not there as witnesses, nor appeared to be in the audience, but no Senator/Congressman/witness, even asked the question, Why did law enforcement let the problem get this big? and What are they going to do about it? There was not even talk of turning over the results of their investigation to the FBI, USPO, etc., nor of having a Federal Grand Jury impaneled to force those schools which refused to cooperate with the Committee to identify their federal employee "graduates". It was obvious to me this main piece of the puzzle was missing.

Further, since these hearings, and the expose of all these federal employees, we outside of Washington, have neither seen nor heard of any action being taken by

Be alert, because we are watching, and we do care.

Thank you for allowing me to appear today and I will answer any questions you may have.

Committee on Education and the Workforce

Witness Disclosure Requirement – "Truth in Testimony"

Required by House Rule XI, Clause 2(g)

Your Name:		
1. Will you be representing a federal, State, or local government entity? (If the answer is yes please contact the committee).	Yes	No <input checked="" type="checkbox"/>
2. Please list any federal grants or contracts (including subgrants or subcontracts) which you have received since October 1, 2000: <i>None</i>		
3. Will you be representing an entity other than a government entity?	Yes	No <input checked="" type="checkbox"/>
4. Other than yourself, please list what entity or entities you will be representing: <i>However, I am employed by Wachovia Corporation.</i>		
5. Please list any offices or elected positions held and/or briefly describe your representation capacity with each of the entities you listed in response to question 4: <i>I am a Vice President in the Corporate Fraud Investigative Service (part of the Audit Dept.)</i>		
6. Please list any federal grants or contracts (including subgrants or subcontracts) received by the entities you listed in response to question 4 since October 1, 2000, including the source and amount of each grant or contract: <i>None</i>		
7. Are there parent organizations, subsidiaries, or partnerships to the entities you disclosed in response to question number 4 that you will not be representing? If so, please list:	Yes	No <input checked="" type="checkbox"/>

Signature:

[Handwritten Signature]

Date:

9/21/04

Please attach this sheet to your written testimony.